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Attorney for Defendants RANDAL Williams, an individual; PROSPERITY FORMULA, LLC, a limited liability company; JUBIMAX, INC., a British Virgin Islands corporation; AFFILIATE PRO, Inc., a British Virgin Islands corporation

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

EADGEAR, INC., a California corporation,
and GOFUNPLACES, INC., a British Virgin
Islands corporation

Plaintiffs,

v.

RANDAL WILLIAMS, an individual,
PROSPERITY FORMULA, LLC, a limited
liability company, JUBIMAX LLC, a
limited liability company, JUBIMAX, INC.,
a British Virgin Islands corporation,
AFFILIATE PRO, INC., a British Virgin
Islands corporation, and DOES 1 to 100,
inclusive,

Defendants.

Case No. 13-01186 JCS

**STIPULATION TO CONSOLIDATE &
[PROPOSED] ORDER**

Date: February 28, 2013
Time: 1:30 p.m.
Courtroom: G
Judge: Hon. Joseph C. Spiero

The Parties in the above-entitled action submit this STIPULATION TO CONSOLIDATE & PROPOSED ORDER:

1. Introduction

Before the Court are two separate actions: *Williams v. eAdGear, Inc., et al.* (Case No: 3:14-cv-00504-JCS) [“the Texas Case”] and *eAdGear, Inc. v. Williams, et al.* (Case No: 3:13-cv-01186-JCS) [“the California Case”]. These cases involve the same parties and factual circumstances. In both cases, the parties are represented by the same counsel. In short, the combined cases represent a complaint and related cross-complaint. Counsel for both sides have agreed to consolidate the cases for the sake of efficiency.

2. Brief Procedural History

The Texas Case was initially filed on February 21, 2013 in the Western District of Texas. The California Case was initially filed on March 15, 2013. Both cases involve the same parties, factual circumstances, and in both cases the parties are represented by the same counsel.

The Texas Case was transferred to this Court on February 3, 2014. The California Case was assigned to Hon. Judge Jeffrey S. White on May 15, 2013. On February 11, 2014 the California Case was referred to Hon. Joseph C. Spiero. Now, both cases which together constitute a complaint and cross-complaint on the same set of facts, are before this Court.

3. Stipulation to Consolidate

The parties agree to have both actions litigated together before magistrate judge Joseph C. Spero and stipulate to consolidate this action into *Williams v. eAdGear Holdings USA Inc.* C 14-00504 JCS.

DATED: February 21, 2014

LAW OFFICES OF DANNING JIANG

By: /s/ Danning Jiang
Danning Jiang, Esq.

Attorneys for Plaintiffs
EADGEAR, INC., a California
corporation, and GOFUNPLACES,
INC., a British Virgin Islands
corporation

DATED: February 21, 2014

VENARDI ZURADA, LLP

By: /s/ Martin Jacek Zurada
Martin Jacek Zurada, Esq.

Attorneys for Defendants
RANDAL WILLIAMS, an individual,
PROSPERITY FORMULA, LLC, a
limited liability company, JUBIMAX LLC,
a limited liability company, JUBIMAX,
INC., a British Virgin Islands corporation,
AFFILIATE PRO, INC., a British Virgin
Islands corporation

~~PROPOSED~~ ORDER

The above stipulation to consolidate is GRANTED.

IT IS SO ORDERED.

Dated: February 28, 2014

